

Appendix E

PHASE I ENVIRONMENTAL SITE ASSESSMENT

This appendix presents a summary of the findings and recommendations of the Phase I Environmental Site Assessment (ESA) prepared for the Ellington Airport. The Airport was assessed on October 27, 2009. The full report is available at the Town of Ellington municipal building. The purpose of the Phase I ESA was to identify recognized environmental conditions, as defined by the American Society for Testing and Materials (ASTM) Standard Practice E 1527-05, associated with the subject site. CHA, Inc (CHA) performed the Phase I ESA in general conformance with the scope and limitations of ASTM Standard Practice E 1527-05.

The intent of the ESA program is to generate documentation that identifies potential environmental concerns associated with a property and, if necessary, that will fulfill one of the requirements to qualify for landowner liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). That is, the practice that constitutes "all appropriate inquiry" into the previous ownership and uses of a property (40 CFR Part 312).

In addition, this investigation was completed in accordance with the guidelines for a Phase I ESA as set forth in the Site Characterization Guidance Document, September 1, 2007, of the Connecticut Department of Environmental Protection's Property Transfer Program.

The Phase I ESA was prepared by CHA to

- Provide a general description of the subject site, any structures occurring thereon, and the site vicinity
- Discuss the current and historical usage of the property
- Identify the presence or absence of recognized environmental conditions in connection with the subject site, based upon the results of historical and regulatory records reviews, interviews, and a site reconnaissance

Referenced facilities can be located on Figure 1-1.

E.1 Site Inspection Findings

1. There is currently one active 10,000 gallon Underground Storage Tank (UST) and several smaller Aboveground Storage Tanks (ASTs) in service at the subject site. The UST contains aviation fuel used for fueling helicopters and private aircraft. Reportedly, two former USTs had been located in the vicinity of the existing tank, though no closure documentation was available or provided to CHA. The largest AST, 2,000 gallons, contains jet fuel used for the turboprop sky diving jump planes. Smaller fuel oil and used oil ASTs are located within the individual tenant spaces.

2. Various containers of motor oil, lubricants, paint, antifreeze, etc. are used and stored in several of the tenant spaces. All of the containers observed at the time of the site inspection were in good condition.
3. A significant amount of debris, old construction vehicles, and equipment are located in and around Facility 6. Deteriorating condition of these items represent a potential impact source.

E.2 Recognized Environmental Conditions

The Phase I ESA has revealed evidence of recognized environmental conditions (RECs) to be associated with the site pertaining to the following:

- Former and existing USTs and ASTs located at the site.
- Documented groundwater contamination and an on-going remediation program associated with the groundwater contamination in the area of Facility 2.
- Use of the site for automotive and aviation repair services.
- Septic systems and the former discharge from floor drains within Facility 1, Facility 2, and Facility 6.
- Potential for soil and/or groundwater contamination in the proximity of Facility 6 resulting from the outdoor storage/disposal of vehicles, equipment, and miscellaneous debris.
- Potential impacts from up gradient industrial facilities located adjacent to the eastern side of the site.

E.3 General Findings/Opinions

1. The Ellington Airport may meet the criteria for an Establishment as defined by the Connecticut Property Transfer Act, based on the reference to records indicting that hazardous waste was generated at the site after November 11, 1980.
1. Though not considered RECs, based on the age of the site structures, asbestos-containing building materials and lead paint may be associated with the buildings.

E.4 Recommendations

1. To evaluate potential impacts from the identified RECs and to establish a baseline/existing condition of the subject site prior to property appraisals by the Town of Ellington, CHA recommends that a subsurface investigation be completed consisting of the installation of soil borings and/or groundwater monitoring wells in the areas of concern, and the analysis of soil and/or groundwater samples for constituents of concern. During the development of the scope of the subsurface investigation, additional reports pertaining to previous investigations, remedial actions, and installation and operation of the existing remedial system should be obtained and reviewed.
2. The Connecticut Property Transfer Program requires the disclosure of environmental conditions when certain real properties are transferred. In accordance with these regulations,

an Environmental Condition Assessment Form is required to be completed and filed with the Department. The Ellington Airport may meet the criteria of an Establishment thereby triggering additional requirements under the Property Transfer Act. The applicability of the Transfer Act and possible implications of the Transfer Act should be discussed with environmental legal counsel. It is recommended that legal counsel review this Phase I ESA and provide the Town of Ellington with a written opinion as to the Transfer Act status of and additional filings that may be applicable to the Ellington Airport.

3. The materials and equipment currently disposed/stored around Facility 6 should be removed and appropriately disposed. As these materials are removed, underlying surfaces should be inspected for evidence of potential impact from the debris (i.e. staining, odors, etc.). If evidence of contamination is identified, the impacted media should be sampled and analyzed for parameters of concern.
4. It should be ascertained if the USTs and ASTs in service at the site are properly registered in accordance with applicable regulations. In addition, the Airport should develop and implement a Spill Prevention Control and Countermeasure (SPCC) Plan in accordance with applicable Federal regulations.
5. An Asbestos and Lead Paint Survey should be completed prior to any renovation or demolition of the site structures with which such materials are suspected to be associated.